

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8412310085 DOC.DATE: 84/12/07 NOTARIZED: YES DOCKET #  
 FACIL:50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331  
 AUTH.NAME AUTHOR AFFILIATION  
 MCGAUGHY,R.W. Iowa Electric Light & Power Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 DENTON,H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for amend to License DPR-49, consisting of  
 Proposed Change Request RTS-177, revising Tech Specs to  
 reflect conformance to Type c testing requirements of  
 10CFR50, App J. Fee paid.

DISTRIBUTION CODE: A017D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4 1/2  
 TITLE: OR Submittal: Append J Containment Leak Rate Testing

NOTES: OL:02/22/74 05000331

	RECIPIENT ID CODE/NAME		COPIES L TTR ENCL		RECIPIENT ID CODE/NAME		COPIES L TTR ENCL
	NRR ORB2 BC	01	7	7			
INTERNAL:	ACRS	07	10	10	ADM/LFMB		1 0
	ELD/HDS2	08	1	1	NRR/DSI/ASB		1 1
	NRR/DSI/CSB	06	1	1	<del>REG FILE</del>	04	1 1
	RGN3		1	1			
EXTERNAL:	LPDR	03	1	1	NRC PDR	02	1 1
	NSIC	05	1	1	NTIS		1 1

w/check \$150-  
 #048307

Iowa Electric Light and Power Company

December 7, 1984  
NG-84-5177

Mr. Harold Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Duane Arnold Energy Center  
Docket No. 50-331  
Operating License No. DPR-49  
Containment Leakage Testing  
File: A-286

Dear Mr. Denton:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.59 and 50.90, Iowa Electric Light and Power Company hereby requests revision to the Technical Specifications (TS) for the Duane Arnold Energy Center (DAEC).

The purpose of this proposed change request is to reflect conformance to the Type C testing requirements of 10 CFR Part 50, Appendix J.

This proposed change request, RTS-177, has been reviewed by both the DAEC Operations Committee and Safety Committee.

In accordance with the requirements of 10 CFR Part 170, we are enclosing the required application fee of \$150.

Pursuant to the requirements of 10 CFR 50.91, a copy of this submittal and analysis of no significant hazards considerations is being forwarded to our appointed state official.

8412310085 841207  
PDR ADOCK 05000331  
P PDR

*A019  
||  
w/check \$150<sup>00</sup>  
# 049307*

Mr. Denton  
December 7, 1984  
NG-84-5177  
Page Two

This application, which consists of three signed originals and 37 copies with their enclosures, is true and accurate to the best of my knowledge and belief.

IOWA ELECTRIC LIGHT AND POWER COMPANY

BY Richard W. McGaughy  
Richard W. McGaughy  
Manager, Nuclear Division

Subscribed and sworn to Before Me on  
this 13<sup>th</sup> day of December 1984

Kathleen M. Sullivan  
Notary Public in and for the State of Iowa

RWM/MG/cg\*

Attachments: 1) Evaluation of Change Pursuant to 10 CFR 50.92  
2) List of Affected Pages

cc: M. Grim  
L. Liu  
S. Tuthill  
M. Thadani  
T. Houvenagle (ICC)  
NRC Resident Office

EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

Summary

The purpose of this proposed Technical Specification change request (RTS-177) is to revise the Duane Arnold Energy Center (DAEC) Technical Specifications (TS) to reflect conformance to the Type C testing criteria of 10 CFR Part 50, Appendix J, Paragraph III.C.2.(b).

Footnote 1 of Table 3.7-2, "Containment Isolation Valves Subject to Type C Test Requirements," distinguishes between those valves tested with air and those tested with water. On page 3.7-24 of the DAEC Technical Specifications, footnote 1 states that valves tested with water shall be pressurized to 54 psig ( $P_a$ ). However, the required test pressure for water tests as set forth in 10 CFR Part 50, Appendix J, Paragraph III.C.2.(b) requires the tests be conducted at a pressure not less than 1.10  $P_a$ . This proposed change request revises the TS to conform to the Type C testing requirements of 10 CFR Part 50, Appendix J, Paragraph III.C.2.(b).

Numerical references to  $P_a$  (54 psig) are being removed to accommodate the changes to page 3.7-24 requested via RTS-165, Power Uprate.

In accordance with the requirements of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based upon the following information:

- (1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: The purpose of the proposed license amendment is to reflect conformance to the Type C testing requirements of 10 CFR Part 50, Appendix J, Paragraph III.C.2.(b) which requires that Type C water tests be conducted at a pressure of not less than 1.10  $P_a$ . The piping and valves, affected by the proposed increase in testing pressure, are designed to withstand pressures of at least 150 psig at 500°F. Based on the above information, the proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) Does the proposed license amendment create the possibility of a new or different kind of accident than any accident previously evaluated?

Response: The proposed change request revises the DAEC Technical Specifications to conform to the Type C testing requirements of 10 CFR Part 50, Appendix J, Paragraph III.C.2.(b) which requires that Type C water tests be conducted at a pressure

not less than 1.10 P<sub>a</sub>. The piping and valves, affected by the proposed increase in testing pressure, are designed to withstand pressures of at least 150 psig at 500°F. Therefore, based upon the above information, this proposed license amendment does not create the possibility of a new or different kind of accident than any accident previously evaluated.

- (3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response: The proposed license amendment does not effect the plant margin of safety as the proposed increase in testing pressure is enveloped by the DAEC pipe break analyses set forth in Chapter 15 of the DAEC Updated Final Safety Analysis Report.

In the April 6, 1983, Federal Register, the NRC published examples of license amendments that are not likely to involve a significant hazards concern if operation of the facility, in accordance with proposed amendment, involves only one or more of the following examples:

- (i) A purely administrative change to Technical Specifications: for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature.
- (ii) A change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications: for example, a more stringent surveillance requirement.

Iowa Electric believes this proposed license amendment request (RTS-177) does not involve a significant hazards concern as it clearly fits within the framework of the above examples.